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*Attorneys for Irving H. Picard, Trustee for the  
Substantively Consolidated SIPA Liquidation of  
Bernard L. Madoff Investment Securities LLC and  
the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

Substantively Consolidated

Appeal 18-cv-07449-PAE

**NOTICE OF TRUSTEE'S APPLICATION FOR AN ORDER TO SHOW CAUSE  
PURSUANT TO LOCAL BANKRUPTCY RULE 9077-1(a)**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Seanna R. Brown, Esq. dated September 19, 2018, Irving H. Picard, as trustee (the "Trustee") for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC ("BLMIS"), under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa-III ("SIPA"), and the chapter 7 estate of Bernard L. Madoff ("Madoff"), by and through his undersigned counsel, the Trustee will move under Rule 9077-1(a) of the Local Bankruptcy Rules for the Southern

District of New York for an order, under Federal Rule of Bankruptcy Procedure 8009,  
authorizing the correction of the record on appeal in the profit withdrawal matter, before the  
Honorable Stuart M. Bernstein, United States Bankruptcy Judge, at the United States Bankruptcy  
Court, One Bowling Green, New York, New York 10004, at a hearing to be set by the Court.

Date: September 19, 2018  
New York, New York

**BAKER & HOSTETLER LLP**

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